



U.S. Department of Justice

United States Attorney  
Southern District of New York

## MEMO ENDORSED

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

June 29, 2023

### VIA Email and ECF

The Honorable Laura T. Swain  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Romero*, 23 Cr 70 (LTS)**

Dear Judge Swain:

The parties submit this joint letter in advance of the July 7, 2023 status conference scheduled in the above-captioned matter to respectfully request a 90-day adjournment in this matter. The parties are engaged in pretrial disposition discussions that they expect to continue. The Court has proposed October 12, 2023 at 11:00 a.m. as the date for the next conference in this matter. Should the Court grant this request, the Government respectfully requests that time be excluded under the Speedy Trial Act from July 7, 2023 until October 12, 2023. The Government submits that the proposed exclusion would be in the interest of justice and will to allow the continued exchange and review of discovery material as well as the continuation of pretrial negotiations. Defense counsel consents to the exclusion.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

by: *Ashley C. Nicolas*  
Ashley C. Nicolas  
Assistant United States Attorney

cc: Counsel of Record

The foregoing request is grant. The conference is hereby rescheduled for October 12, 2023, at 11 a.m. The Court finds pursuant to 18 U.S.C. section 3161(h)(7)(A) that the ends of justice served by an exclusion from today's date through October 12, 2023, outweigh the best interests of the public and the defendant in a speedy trial for the reasons stated above. Docket entry no. 25 is resolved. SO ORDERED.

Dated: 6/29/2023

/s/ Laura Taylor Swain, Chief. U.S.D.J.